

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN  
EAU CLAIRE DIVISION

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In re:  
RICHARD KRUCHTEN  
and MARIAN KRUCHTEN,  
Debtors.

Chapter 13  
Case No. 18-10318-BHL

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STIPULATION ON MOTION FOR RELIEF FROM AUTOMATIC STAY AND  
ABANDONMENT OF FEDERAL NATIONAL MORTGAGE ASSOCIATION ("FANNIE  
MAE"), A CORPORATION ORGANIZED AND EXISTING UNDER THE LAWS OF THE  
UNITED STATES OF AMERICA  
RE: PROPERTY LOCATED AT:  
E8032 1325<sup>th</sup> Avenue, Ridgeland, Wisconsin 54763

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Whereas, Debtors having filed an objection to the Motion for Relief from Automatic Stay  
and Abandonment of Federal National Mortgage Association ("Fannie Mae"), a corporation  
organized and existing under the laws of the United States of America ("Movant"); and,

Whereas, the parties having arrived at an agreement resolving the post-petition default set  
forth in the Motion;

Now, Therefore, It Is Hereby Stipulated and Agreed as follows:

**TERMS:**

1. That Movant may file a supplemental claim in the amount of \$2,389.60 for the  
post-petition arrears; consisting of post-petition payments which came due June 1, 2018, through  
August 1, 2018, at \$589.88, each; minus suspense funds of \$411.04; plus \$850.00 for

Drafted by:

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attorneys' fees and \$181.00 for the Motion for Relief filing fee. The Standing Trustee is authorized and directed to pay from funds of the estate a supplemental claim filed pursuant to an Order on this Stipulation.

2. That commencing with the September 1, 2018 payment, Debtors shall resume making regular post-petition mortgage payments directly to Movant when due. Until further notice, the monthly payment is \$589.88 and monthly payments shall be sent exclusively to: Seterus Inc., P.O. Box 54420, Los Angeles, CA 90017.

3. That Movant is granted a doomsday provision on all heretofore tendered payments and on all payments from September 1, 2018, through February 1, 2019. That, if any previously tendered payments return insufficient funds or if Debtors for any reason fail to timely make any payment due beginning September 1, 2018 through February 1, 2019, upon the filing of a statement of default with notice to Debtors and counsel for Debtors, Movant shall be entitled to submit an order granting the relief requested in the original motion, including relief from automatic stay and abandonment.

4. Thereafter, in the event Debtors fail to timely make any payments to Movant or breaches any of the remaining terms and conditions of the note and mortgage, Movant may renew its Motion for Relief from the Automatic Stay and Abandonment for the remainder of this case by letter request to the Court and without the need to pay an additional filing fee.

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Dated this 23<sup>rd</sup> day of August, 2018.

O'DESS AND ASSOCIATES, S.C.  
Attorneys for Movant

By: D. Alexander Martin  
State Bar ID No. 1046591

Dated this 22<sup>nd</sup> day of August, 2018.

PILETICH & SKOKAN, P.A.  
Attorneys for Debtors

By: Urosh Piletich  
State Bar ID No. MN 027849X

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